## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT GREENEVILLE

B.P., H.A., and S.H., individually, and on behalf of all others similarly situated, Plaintiffs, VS. CITY OF JOHNSON CITY, TENNESSEE; KARL TURNER, individually, and in his official capacity as Chief of the Johnson City Police Department; KEVIN PETERS, individually, and in his CASE NO. official capacity as Captain in the \* 2:23-cv-00071-TRM-JEM Johnson City Police Department; TOMA SPARKS, individually, and in his official capacity as Investigator in the Johnson City Police Department; JUSTIN JENKINS, individually, and in his official capacity as Investigator in the Johnson City Police Department; JEFF LEGAULT, individually, and in his official capacity as Investigator in the Johnson City Police Department; BRADY HIGGINS, individually, and in his official capacity as Investigator in the Johnson City Police Department; and DOES 8-20, inclusive,

#### PRETRIAL DISCOVERY DEPOSITION OF

## H. A.

(Taken May 21, 2024)

\*\*\*THIS STYLE PAGE CONTINUES\*\*\*

# COURT REPORTING AND VIDEO SERVICES

P. O. Box 7481 Kingsport, TN 37664

Defendants.

TELEPHONE: (423) 230-8000 REBECCA@COURTREP.NET

22		respect to Sean Williams at all?
23	A.	Specifically him?
24	Q.	Yeah.
25	A.	I do not know. That's not my job to know, so I would say
	н.	A. DIRECT - RADER
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	l	
	and seek and	
1		that would be something my lawyers would know. I don't
2		specifically know that information, those details about
3		him.
II	н. А	A. DIRECT - RADER
		277
5	Q.	All right. What is the basis for you to say that Kevin
6		Peters was involved in any extortion involving Sean
7		Williams, that individual?
8	Α.	That is not my job to explain. That is my lawyers' job.
	н.	DIRECT - RADER
	44.	278

21 Q. All right. Do you know anything that he has done with

8	Q. So you don't you can't name a single witness today.
9	Can you provide a single document today?
10	MS. KRAMER: Objection.
11	A. That is not my responsibility. It is the responsibility
12	of my lawyers.
	DIDHOM DADED
	H. A. DIRECT - RADER
	279
18	Q. And so that's the question. What facts do you know of
19	that are not in the filing that you claim that any of
20	these individuals, not just some broad scattershot Johnson
21	City Police Department, but any of these individuals, can
22	you tell me any facts that are not in your filing?
23	MS. KRAMER: Objection.
24	A. I cannot tell you any facts that are not in the file.
25	That is the responsibility of my lawyers as well as other
	H A DIRECT - RADER
	H. A. DIRECT - RADER 281
l	. 201
1	Defendants in this case.
	H. A. DIRECT - RADER
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### CERTIFICATE

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of H. A. was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 3rd day of June, 2024.

Rebecca Overbey LICENSED COURT REPORTER State of Tennessee LCR #078

My License Expires:

June 30, 2026

\*\*\*CERTIFIED ONLY IF AFFIXED SEAL IS GREEN\*\*\*